

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:24-CR-118

v.

Hon. Robert J. Jonker
U.S. District Judge

DAVID MARK BARTELS,

Defendant.

TRIAL STIPULATIONS

The parties jointly stipulate and agree to the following:

1. The explicit videos found on the seized devices and their associated metadata are admissible without the need for additional foundation or authentication.
2. The defendant is a United States citizen.
3. The business records provided by PayPal, Inc. are true and accurate records generated from regularly conducted business practices and are admissible without any need for additional foundation or authentication.
4. The Possession of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(5)(A), is an offense punishable by more than 1 year in prison.
5. The extractions of the Western Digital 5TB External Hard Drive, the MSI Laptop, and the Dell Laptop in this case were accurately and reliably performed.
6. The defendant was employed by the Armed Forces outside the United States as defined by 18 U.S.C. § 3267(1). That is, between May 2019 and January 2023, he was a civilian employee of a fuel supplier located onboard Naval Station Guantanamo Bay, Cuba, was present and residing outside the United States in connection with such employment, and was not a national of, nor ordinarily resident of Cuba.
7. The last known residence of the defendant prior to his arrival in Cuba in or about May 2019 was Grand Rapids, Michigan, and therefore venue is proper in the Western District of Michigan.

/s/ Ryan Maesen (with permission)

RYAN MAESEN

Attorney for David Mark Bartels

Date: December 31, 2024

/s/ Doaa K. Al-Howaishy

DOAA K. AL-HOWAISHY

Assistant United States Attorney

MCKENZIE HIGHTOWER

Trial Attorney

Department of Justice – CEOS